

EXHIBIT A

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO, EASTERN DIVISION

CHRISTIAN LEONHARDT,)	CASE NO. 1:15CV2507
)	
Plaintiff,)	JUDGE GWIN
)	
vs.)	<u>DECLARATION OF ROBERT</u>
)	<u>STROLLO</u>
SERGEANT ROBERT STROLLO, <u>et al.</u> ,)	
)	
Defendants.)	

I, Robert Strollo, pursuant to 28 U.S.C. § 1746, hereby declare, under penalty of perjury, the following:

1. I have been a sworn police officer in the State of Ohio and an employee of the City of Cleveland ("City") police department since 1999. I have been a sergeant with the City for approximately 3 years. Based on my employment and my review of portions of the Cleveland Police Department ("CPD") file, I have personal knowledge of the facts contained herein.

2. In 2013, I was the sergeant assigned to the Third District Downtown Services Unit. This Unit includes downtown and the area where the Crazy Horse Men's Club is located.

3. My duties include supervising the officers and activities in that Unit and District.

4. On or about November 16, 2013, I was tasked with following up at the Crazy Horse Men's Club on a Mayor's Political Action Complaint ("PAC"). A PAC is a complaint made to the Mayor's Office and then assigned to certain departments to investigate and report back to the Mayor's Office.

5. On November 16, 2013, I reported to the Crazy Horse to speak to the manager Umberto "Pete" Caniglia. As I was leaving after speaking to Mr. Caniglia, we were approached by an employee, later learned to be Monica Delagarza.

6. Ms. Delagarza indicated that Christian Leonhardt was there and was threatening her. Leonhardt was her ex-boyfriend and the father of her child.

7. When Caniglia and I approached Leonhardt, he was trash-talking us. He was belligerent and did not leave the premises. He went out the front door and stopped in the area that is considered a patio.

8. I went back into the club to see the off duty police officer there as Leonhardt refused to leave. When I came back outside, I witnessed Leonhardt charge Umberto and Umberto pinned him to the wall trying to avoid fighting. I observed Leonhardt bite Umberto which caused a bite mark on his scalp.

9. At no point did I assault Leonhardt or direct Caniglia to do so. Nor did I leave them alone so that Caniglia could do so.

10. I arrested Leonhardt for assault and domestic violence. Two other officers transported him to St. Vincent Charity Hospital and to jail. Leonhardt continued to be belligerent and hostile in the zone car. He eventually asked how to press charges for assault and I advised him he could talk to the prosecutor to press charges.

11. Later, the domestic violence detective assigned to the file, Det. Nicole Biggers, charged Leonhardt with disorderly conduct, domestic violence and assault. After the date of the incident, Det. Biggers handled the file. She charged Leonhardt and made the determination as to the appropriate charges after conducting her own investigation.

12. I took no written statements from witnesses or victims. The investigation was conducted by Det. Biggers. The charges were eventually dropped.

13. Later, I received text messages from Leonhardt on my personal cell phone. They contained veiled threats against me as they indicated that Leonhardt knew of my marital status,

income, employment, and residence. The messages were aggressive and vulgar. I reported this behavior. Det. Reese conducted the investigation of this activity.


14. I did not testify at the grand jury about Mr. Leonhardt or determine to press charges against him.

15. At all times, I was acting within the scope of my employment at the City of Cleveland.

16. Copies of the text messages and the statement of Ms. Delagarza given to Det. Biggers are attached hereto. These are business records of the City kept in the ordinary course of business.

I declare under penalty of perjury that the foregoing statements are true and correct.

Executed on July 25, 2016.



Robert Strollo

VOLUNTARY STATEMENT OF THE VICTIM

DATE: 11/14/2013 NAME: Monica B. Delagarza

DATE OF BIRTH: 12/4/1986

SOCIAL SECURITY NUMBER: [REDACTED]

ADDRESS: 1549 ROCKWAY AVE. ZIP: 44107

PHONE: home: cell: 440-666-4136 work:

I, Monica Delagarza do hereby make the following statement to a person who has identified themselves as a police officer. I make this statement of my own free will concerning an incident that happened on or about (date) 11/14/2013

At (location of incident) 1438 St Clair Cleveland, OH

Name of suspect: Christian R Leonhardt

Suspect's relationship to you: Babies father / EX

What happened?

Christian came into my work, very
intoxicated. Saw me sitting with
someone then proceeded to call me
names and threatened my life. I
then ran as fast as I could straight
into the arms of the sergeant cop
on duty to have him remove him.

Please continue onto the next page

from the premeditation.

- He called me a nasty bitch
and he ^{said} would was gunna kill me

The following people witnessed this incident:

Witness name: _____

Address: _____

Phone: _____ **Relationship to you:** _____

Witness name: _____

Address: _____

Phone: _____ **Relationship to you:** _____

Witness name: _____

Address: _____

Phone: _____ **Relationship to you:** _____

If you need additional space for your statement or have additional witnesses, please use another form and attach it to this one.

The above statement is a true and accurate record of the events which took place on the date and location stated herein. This statement was provided by me voluntarily with no promise of reward.

Your signature: M. Dunn

Witnessed by: _____

Date: 11/14/2013

●●●●● Verizon 3G

4:34 AM



< Messages

Contact

Text Message
Yesterday 11:54 PM

Hey broke fag!!! You
charged yet? Lol... Bad
bad broke cop!!! What r u
gong to do now? Maybe
you and Pete can suck
dick 4 money!!! Lol

Who is this

Today 12:00 AM

Someone who has more
money than you!!!! Lol...
Internal affairs getya???
Monica is bad news
right?? You guys shouldn't

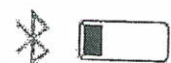


Text Message

SMH

••••• Verizon 3G

4:35 AM



< Messages

Today 12:00 AM

Someone who has more money than you!!!! Lol... Internal affairs getya??? Monica is bad news right?? You guys shouldn't have set me up!!! Now you get fucked!!!!

I havent set anyone up

Why are you being charged? Fag?? How's your new fat wife?

I dont have a wife



Text Message

CITY 283

Send

●●●●● Verizon 3G

4:35 AM



< Messages

Cont is.

Sorry fiance

???

As far as IA I havent done
anything wrong so Ill be
fine

All you need to know
officer ... Wait Sgt. Strollo
is your fucked!!!! Can't
wait!!!!!! Ttyl!!

Not what I'm hearing!!!

Ok Chris



Text Message

Send

●●●●○ Verizon 3G 4:35 AM



< Messages

Ok Chris

That's right buddy!!!! I
would say I'll buy your
house when u lose it
But wait... U don't own
one!!

So I dont own a house?

Not according to
cuyahogh, summit, or
Medina!!

You mad you can't hang at
the house any more?



Text Message

●●●●○ Verizon 3G

4:35 AM



< Messages

Contact

You mad you can't hang at
the house any more?

At what house? No I dont
have a house, so what?

Your broke!!!

No one set u up Chris

You did!!! Two cop
witnesses saying it!!! Your
going down!!! I bet you
never met monica !!! Lol

I'm suing you, city of
Cleveland, the horse and



Text Message

Send

●●●●○ Verizon 3G

4:37 AM



< Messages

I'm suing you, city of
Cleveland, the horse and
al Spencer!!!

I just wanted to let you
know how I feel before u
get fucked!!!

I met monica the night you
threatened to kill her n I did
her police report

So

I'm not one of the broke
kids u fuck with!!!

No... You broke fuck!! She



Text Message

●●●●● Verizon 3G

4:38 AM



< Messages

Contact

No... You broke fuck!! She told me she's been talking to you and that she told you all about it situation. You think IA doesn't have the guys phone records you idiot

What guys phone records?

They can have all of mine

Okay dummy Im done talking. Have a nice broke life!!! Oh... BTW I'm at my tattoo shop that I own if you want to talk face to face



Text Message

••••• Verizon 3G

4:38 AM



< Messages

Contact

Sure what shop

You idiot... You think she's
going to lie for you?

Lie for what

True Art Tattoos. 3829
Lorain Ave, Cleveland,
Ohio 44113

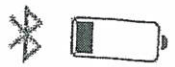
Okay dummy Im done
talking. Have a nice broke
life!!! Oh... BTW I'm at my
tattoo shop that I own if
you want to talk face to
face



Text Message

Verizon 3G

4:38 AM



< Messages

Contact

face

What ever

Yeah I know

Dont text or call me
anymore

I would never officer or I'm
sorry sgt Strollo. You won't
be trying to have me
charged with harassment.
If you choose not to talk to
me anymore I respect that
have a nice broke life you
fat fuck



Text Message